

Exhibit A

Stipulation

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

<i>In re</i> Boy Scouts of America and Delaware BSA, LLC, ¹ Debtors.	Chapter 11 Bankruptcy Case No. 20-10343 (LSS) (Jointly Administered)
National Union Fire Insurance Co. of Pittsburgh, PA, <i>et al.</i> , Appellants. v. Boy Scouts of America, <i>et al.</i> , Appellees.	Case No. 22-cv-01237-RGA

STIPULATION TO EXTEND WORD LIMITS

Boy Scouts of America and Delaware BSA, LLC (together, the “Debtors”),
and one or more of the Certain Insurers,² the claimants represented by Dumas &

¹ The Debtors in the chapter 11 cases, together with the last four digits of each Debtor’s federal tax identification number, are as follows: Boy Scouts of America (6300); and Delaware BSA, LLC (4311). The Debtors’ mailing address is 1325 West Walnut Hill Lane, Irving, Texas 75038.

² The Certain Insurers are Allianz Global Risks US Insurance Company, National Surety Corporation, Interstate Fire & Casualty Company, Argonaut Insurance Company, Colony Insurance Company, Liberty Mutual Insurance Company, The Ohio Casualty Insurance Company, Liberty Insurance Underwriters, Inc., Liberty Surplus Insurance Corporation, General Star Indemnity Company, Great American Assurance Company f/k/a Agricultural Insurance Company, Great American E&S Insurance Company f/k/a Agricultural Excess and Surplus
(*Cont’d on next page*)

Vaughn, LLC, and the claimants represented by Lujan & Wolff LLP (collectively, the “Appellants,” and with the Debtors, the “Parties”) hereby stipulate and agree as follows (the “Stipulation”):

A. WHEREAS, on March 28, 2023, this Court entered an order affirming the Bankruptcy Court’s Supplemental Findings of Fact and Conclusions of Law, dated September 8, 2022 [D.I. 151] (the “Affirmation Order”);

B. WHEREAS, on March 31, 2023, the Certain Insurers filed an *Emergency Motion for Stay Pending Appeal and Temporary Stay While the Court Rules on the Motion* [D.I. 152];

C. WHEREAS, on April 1, 2023, the claimants represented by Dumas & Vaughn, LLC, and the claimants represented by Lujan & Wolff LLP filed similar motions seeking a stay of this Court’s order affirming the Bankruptcy Court’s

Insurance Company, Great American E&S Insurance Company, Arch Insurance Company, Continental Insurance Company, Columbia Casualty Company, Indian Harbor Insurance Company on behalf of itself and as successor in interest to Catlin Specialty Insurance Company, Travelers Casualty and Surety Company, Inc. (f/k/a Aetna Casualty & Surety Company), St. Paul Surplus Lines Insurance Company, Gulf Insurance Company, Arrowood Indemnity Company, Gemini Insurance Company, Munich Reinsurance America, Inc., formerly known as American Re-Insurance Company, Traders and Pacific Insurance Company, Endurance American Specialty Insurance Company, Endurance American Insurance Company, Old Republic Insurance Company, National Union Fire Insurance Company of Pittsburgh, PA., Lexington Insurance Company, Landmark Insurance Company, and The Insurance Company of the State of Pennsylvania.

Confirmation Order [D.I. 154, D.I. 156] (collectively with the Certain Insurers' motion, the "Stay Motions");

D. WHEREAS, to limit the briefing submitted to this Court, the Debtors intend to file a single omnibus response in opposition to all three Stay Motions (the "Omnibus Response");

E. WHEREAS, pursuant to Rule 8013(f)(3) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), the Debtors would ordinarily be limited to a maximum of 5,200 words in their response to each of the three Stay Motions, for a total maximum of 15,600 words;

NOW, THEREFORE, it is hereby stipulated and agreed to by and among the Parties:

1. The Parties hereby agree and stipulate that the word limit for the Debtors' Omnibus Response is extended to a limit of 10,000 words, exclusive of any accompanying supporting documents.

Dated: April 4, 2023

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